

Gregg S. Kleiner, State Bar No. 141311  
RINCON LAW LLP  
268 Bush Street, Suite 3335  
San Francisco, CA 94104  
Telephone No.: 415-672-5991  
Facsimile No.: 415-680-1712  
Email: [gkleiner@rinconlawllp.com](mailto:gkleiner@rinconlawllp.com)

Proposed Counsel for PAUL MANSDORF,  
Trustee in Bankruptcy

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

In re

RENOVII INC.,

Debtor.

Case No. 23-40110 WJL  
Chapter 7  
Hon. William J. Lafferty, III

**APPLICATION FOR AUTHORITY TO  
EMPLOY COUNSEL  
(Rincon Law LLP)**

[No Hearing Requested]

Paul Mansdorf, Trustee in Bankruptcy of the estate of the above-named Debtor ("Applicant" or "Trustee"), respectfully represents:

1. Applicant is the duly appointed, qualified and acting trustee in bankruptcy in this case.

2. Applicant desires to retain Rincon Law LLP ("Proposed Counsel" or "Rincon Law"), as Trustee's counsel in connection with all matters related to the above-referenced Chapter 7 proceeding, including, but not limited to:

a) Assist and advise the Trustee in legal aspects involved in the investigation, collection and liquidation of potential assets of the estate;

b) Assist and advise the Trustee regarding any transfers which may be avoidable under the provisions of the Bankruptcy Code;

c) Represent the Trustee in litigation he determines to be necessary;

1                   d)     After Applicant's review and request, assist the Trustee in the objection to  
2     claims; and

3                   e)     Attend Court hearings related to the foregoing.

4           3.     Applicant desires to retain Proposed Counsel on the basis of its expertise in  
5     bankruptcy law and believes that retention of counsel is necessary and would be in the best interests  
6     of the estate.

7           4.     The Debtor filed a skeleton Chapter 7 petition on January 31, 2023. At the time this  
8     Application was executed, the Debtor had not filed any schedules or statement of financial affairs.  
9     Applicant understands that there may be assets available for creditors. Applicant seeks the  
10    assistance of counsel to work with counsel for the Debtor to help ensure completed schedules are  
11    filed, that estate assets are delivered to Applicant, and requests a waiver of FRBP Rule 6003.

12          5.     Rincon Law is a firm organized in San Francisco. To the best of Applicant's  
13    knowledge, Proposed Counsel has no connection with the Debtor, creditors, or any other party in  
14    interest, their respective attorneys and/or accountants, the United States Trustee or any person  
15    employed in the Office of the United States Trustee, except as set forth in the declaration in support  
16    of this application filed concurrently ("Declaration"). Proposed Counsel does not presently represent  
17    any interest adverse to the Trustee or to the estate, except as set forth in the Declaration. Proposed  
18    Counsel is a disinterested person.

19          6.     Proposed Counsel generally charges on an hourly rate basis. The current rate charged  
20    by members of Proposed Counsel that are expected to render the majority of the services to  
21    Applicant is \$595 an hour. Proposed Counsel's rates are subject to change from time to time, but  
22    generally not more than once per year.

23          7.     As a general rule, Proposed Counsel's billing practices are identical for bankruptcy  
24    and non-bankruptcy clients. The hourly rates on which Proposed Counsel bases its fees are generally  
25    the same for bankruptcy and non-bankruptcy clients but can be higher for non-court-appointed  
26    representations.

27          8.     Proposed Counsel is in compliance with the Bankruptcy Court's Guidelines for  
28    Compensation and Expense Reimbursement of Professionals and Trustees. It does not charge for its

1 word processing and incoming telecopy costs. Additionally, Proposed Counsel's San Francisco  
2 office charges \$0.20 per page for photocopying; other clients of Proposed Counsel are charged  
3 varying rates for reimbursement of that expense. In some instances, Proposed Counsel assesses a  
4 charge on some out-of-pocket costs to reimburse it for administrative overhead expense; Proposed  
5 Counsel does not include such charges in bankruptcy fee applications.

6 9. This employment application is the entire agreement of the Trustee and Applicant as  
7 to the terms of employment. There is no separate written or oral employment agreement.

8 WHEREFORE, Applicant prays for an Order authorizing the employment of Rincon Law  
9 LLP as Trustee's counsel.

10  
11 DATED: February \_\_\_\_, 2023

12 Paul J.  
13 Mansdorf  
14 By: PAUL MANSDORF  
15 Trustee in Bankruptcy

Digitally signed by Paul  
J. Mansdorf  
Date: 2023.02.08  
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17 DATED: February 8, 2023

RINCON LAW LLP

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19 By: /s/ Gregg S. Kleiner  
20 GREGG S. KLEINER  
21 Proposed Counsel for PAUL MANSDORF  
22 Trustee in Bankruptcy  
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